

EXHIBIT 1

May 13, 1980 Letter from GE to DEC

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GE COMPANY SCHENECTADY, NEW YORK 12345
 Building 2000, Watt Street Plant Phone (518) 385-2500

TURBINE HOUSING

May 13, 1980

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BUREAU OF HAZARDOUS
WASTE MANAGEMENT PROGRAMS

Mr. H. Peter Lannan, Jr.
 First Deputy Commissioner
 Department of Environmental
 Conservation, New York State
 50 Wolf Road
 Albany, New York 12233

Dear Peter,

As you know, over the course of the past several months, we have been attempting to verify information previously submitted with respect to off-site disposal of GE wastes in New York State since the late 1940's. We have also attempted to develop new data in response to questions you have raised. This has been an easy task, given the lack of records and the failure of memory occasioned by the passage of some thirty years' time. Nonetheless, we are now sufficiently comfortable with the scope of our investigatory efforts and the accuracy of our information to provide you with an update on the following topics: (1) components which did business with Dewey Loeffel; (2) quantities and distribution of PCB's, chrysotile, capacitors disposed of by Falls/Ft. Edward; and (3) any additional disposal sites in New York State developed via interview of knowledgeable employees.

- (1) We believe the following comprises a complete list of GE components which did business with Dewey Loeffel:

Schenectady Main Plant - Based on interview of employees, we believe Main Plant first began to do business with Dewey Loeffel in 1968. We had previously told you that Main Plant disposed of approximately 1.6T of A-3 waste per year through Loeffel. Further investigation has disclosed no different or additional information about the character or quantity of these wastes.*

Corp. R&D (CR&D) - Between the years 1973 and 1977, CR&D disposed of a total of 180T of A-3 waste through Dewey Loeffel, and 12T of B7 waste.

Waterford - Waterford disposed of A-1, A-2, A-3, A-4, A-9, B-1, B-3 and C-3 wastes, totalling approximately 15,000T., through Dewey Loeffel during the years 1958-1966.

*For the sake of consistency, we have continued to classify wastes in accordance with the "Hazardous Waste Categories" (copy enclosed) we have used in all previous submittals. For the sake of conformity, all quantities set forth in this letter will be stated in units of Tons.

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Selkirk - Selkirk disposed of A-2, A-9 and B-1 wastes, totalling approximately 210T., through Dewey Loeffel during the years 1967-1968.

Pittsfield (Large Transformer Business Division) - Pittsfield (Transformer) disposed of A-2, A-3, A-6 and A-9 wastes, totalling approximately 430T., through Dewey Loeffel during the years 1958 or 1960 through 1971.

Pittsfield (Plastics Business Division) - Pittsfield (Plastics) disposed of A-2, A-9 and B-2 wastes, totalling approximately 1300 T., through Dewey Loeffel during the years 1962-69.**

Hudson Falls/Ft. Edward - Hudson Falls/Ft. Edward sold approximately 242 T. of A-3 wastes to Dewey Loeffel during the years 1952-1960.

Finally, I would like to try to clarify the confusion which apparently has resulted from our statement that GE sent no Aroclor 1260 to Dewey Loeffel and your question as to what Aroclors GE did send. Monsanto sold liquid PCB's under the brand name "Aroclor." Monsanto also assigned product numbers that usually reflected the average degree of chlorination or, what is equivalent, the weight-percent chlorine in the different Aroclors. Thus, for example, Aroclor 1254 contained 54% chlorine, or 5 atoms per biphenyl, on the average.

Most Aroclors manufactured by Monsanto had multiple applications, or were used in different products. Of the GE components named above, only Hudson Falls/Ft. Edward and Pittsfield (Large Transformer) purchased Aroclors; however, our records do not indicate that either Hudson Falls/Ft. Edward or Pittsfield (Large Transformer) sent Aroclor 1260 or any other Aroclor to Dewey Loeffel.

As noted above, however, our Waterford plant sent wastes to Dewey Loeffel. These wastes contained, as a by product of the Waterford manufacturing process, mono- and dichlorobiphenyls and no other type of PCB's. These PCB's are not Aroclors because, as noted above, Aroclor is the brand name for the products manufactured by Monsanto and sold to industry. In order to equate Waterford's PCB's to an Aroclor, consider that mono-chlorobiphenyls are, on the average, 19% chlorine, and dichlorobiphenyls are, on the average, 32% chlorine, while Aroclor 1260 is, on the average, 60% chlorine.

- (2) Based on interviews and interpolation from records, our best estimate of the quantity and distribution of PCB's in scrap capacitors in the various municipal landfills in the Hudson Falls/Ft. Edward area and of scrap liquid PCB's at the

**This information with respect to Large Transformer & Plastics is the same as and verifies the information provided you in my letter dated 1/21/80.

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Caputo site is as follows:

<u>Site</u>	<u>Period of Use</u>	<u>Total PCB's</u>
Old Ft. Edward	1947-1952	310 T.
Ft. Miller	1953-1965	1,420 T.
Kingsbury	1952-1976	1,900 T.
Ft. Edward	1970-1976	850 T.
Caputo	1958-1969	150 T. *

In addition, we have discovered records which indicate the sales of miscellaneous scrap, including steel, tin, copper, iron, corrugated material, sludge and brass to Adirondack Waste, which you have commonly referred to as "Alkes." None of our records indicate the sale of scrap capacitors to Adirondack Waste.

Our records indicate that Hudson Falls/Ft. Edward sold scrap to Adirondack Waste from 1951-1962. Based on interviews, we believe Hudson Falls/Ft. Edward continued to sell scrap to Adirondack Waste until approximately 1965 or 1966.

Interviews with retired employees have indicated that Adirondack Waste hauled scrap power capacitors from the Hudson Falls Plant. The information developed from our interviews is, quite frankly, contradictory as to the frequency with which Adirondack Waste may have hauled away power capacitors and, consequently, the quantity of power capacitors Adirondack Waste may have hauled.

Faced with this contradiction in our information, we have assumed that Adirondack Waste hauled roughly half the estimated scrap power capacitors generated during the years 1952-1965 (or an estimated 210 T. of PCB's). This simply points up the fact that all the estimates presented above are and can only be subject to inaccuracies of as much as 50%, despite the fact we have worked very hard to develop and present to you the most accurate information possible.

There are two other matters concerning past waste disposal practices at Hudson Falls/Ft. Edward which we are now in a position to clarify. First, from 1966 until approximately

*This is less than the 905,000 lbs. we previously acknowledged because of our discovery that, in addition to scrap liquid PCB's, Caputo also disposed of Triad, Dowtherm, scrap oils/liquids, sludge and miscellaneous scrap.

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March, 1971, Modern Waste Disposal (or "Pcdone Brothers") of Schenectady, New York hauled wastes from the Hudson Falls/Ft. Edward facilities to the Kingsbury and Ft. Edward landfills. Sperry Trucks, Inc. (now North American Recycling) succeeded Modern Waste Disposal.

In addition, we have made further attempts to confirm or deny the various rumors regarding the giving away or sale of scrap liquid PCB's to employees and/or municipalities. In our records, we have found a reference to the sale of scrap material (no description) to the Queensbury Highway Dept. in 1965-1967. Also, some retired employees remember (or believe) Hudson Falls/Ft. Edward sold mineral oil and/or used pump oil to employees and governmental entities. (Note that such material is not scrap liquid PCB's or "off spec PCB oils.")

- (3) Our interview of knowledgeable employees developed the following additional waste disposal sites in New York State where GE components disposed of wastes other than trash:

Utica - Prior to 1971, Utica disposed of unknown quantities of trash, including batteries, at a municipal site on Leland Avenue in Utica, New York. This municipal site is not to be confused with the adjacent Universal Waste site.

Utica - In the late 1950's and early 1960's Utica disposed of unknown quantities of scrap, possibly including a small quantity of such chemicals as plating wastes and sludges at the New Hartford Village Dump in the Town of New Hartford.

Again, the above represents our most recent information. We believe it is fully responsive to any and all outstanding questions; however, we will be happy to discuss this material further with you and your staff.

Very truly yours,

Jack

J. J. O'Connor